

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

GARRICK CALANDRO, AS
ADMINISTRATOR OF THE ESTATE OF
GENEVIEVE CALANDRO,

Plaintiff

NO. 1:15-cv-10533-PBS

v.

SEDGWICK CLAIMS MANAGEMENT
SERVICES, INC.,

Defendant

JOINT STATEMENT OF THE PARTIES PURSUANT TO LOCAL RULE 16.1(D)

Pursuant to Rule 16(B) of the Federal Rules of Civil Procedure and Local Rule 16.1(D) (D.Mass.), counsel for the plaintiff Garrick Calandro, as the Administrator of the Estate of Genevieve Calandro, and counsel for the defendant Sedgwick Claims Management Services, Inc. have conferred and submit the following joint statement in connection with the initial scheduling conference to be held before the Court.

1. **PROPOSED AGENDA OF MATTERS TO BE DISCUSSED AT SCHEDULING CONFERENCE**

Establishment of Pre-Trial Schedule, including discovery, dispositive motions and case management conference.

2. **PROPOSED PRE-TRIAL SCHEDULE**

a. **Proposed Schedule For Discovery**

<u>Event</u>	<u>Deadline</u>
Service of Rule 26 Initial Disclosures	5/5/15
Deadline to serve written discovery requests (with the exception of requests served under Fed. R. Civ. P.36)	6/1/15

Close of fact discovery	11/30/15
Deadline for expert disclosures on which a party has the burden of proof	1/15/16
Deadline for rebuttal expert disclosures	3/1/16
Competition of all expert depositions	4/1/16

b. Proposed Scheduling For The Filing Of Motions

<u>Event</u>	<u>Deadline</u>
Deadline to file all motions under Fed. Civ. P. 15, 19, and 20 (subject to later filing if based on information provided in discovery)	7/31/15
Deadline to file motions for summary judgment	5/16/16
Status Conference	9/15/16

3. CERTIFICATION OF CONFERENCE REGARDING BUDGET AND ALTERNATIVE DISPUTE RESOLUTION

The parties will file their certifications pursuant to Local Rule 16.1(D)(3) under separate cover.

4. TRIAL BEFORE MAGISTRATE JUDGE

The parties do not consent to trial before a Magistrate Judge.

Plaintiff,
GARRICK CALANDRO, AS
ADMINISTRATOR OF THE ESTATE OF
GENEVIEVE CALANDRO

By his attorneys,

/s/ Krzysztof G. Sobczak
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April 9, 2015

Defendant,
SEDGWICK CLAIMS MANAGEMENT
SERVICES, INC.

By their attorneys,

/s/ Allen N. David
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CERTIFICATE OF SERVICE

I, Allen N. David, hereby certify that I have this 9th day of April 2015, served a copy of the foregoing document, by causing a copy thereof, to be sent electronically, through the ECF system, to the registered participants in this case, as identified on the Notice of Electronic Filing (NEF).

/s/ Allen N. David
Allen N. David

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